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10 *Representing the United States of America*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 STEVEN BRYAN,

18 Defendant.

19 Case No. 3:19-CR-00060-MMD-WGC

20 STIPULATION TO EXTEND TIME TO
FILE REPLY TO DEFENDANT'S
RESPONSE [ECF #28] TO
GOVERNMENT'S MOTION [ECF #25]

21 (First Request)

22 IT IS HEREBY STIPULATED AND AGREED by and through Nicholas A.
23 Trutanich, United States Attorney for the District of Nevada, Penelope J. Brady, Assistant
24 United States Attorney, counsel for the United States of America, and Christopher Frey,
Assistant Federal Public Defender, counsel for Defendant Steven Bryan, to extend the time
in which the Government's Reply to Defendant's Response [ECF #28] to the Government's
Motion [ECF #25] is due from December 21, 2020, to January 15, 2021. This is the first
request for an extension. Trial is currently set for March 8, 2021.

1 Government counsel is respectfully requesting the additional time to reply to the
2 defendant's response because (i) the implications for the Washoe County Sheriff's Office
3 Forensic Science Division ("WCSO-FSD") could be potentially significant and the
4 government is gathering input from them, (ii) the recent hospitalization of a family member
5 of one of the government's counsel, and (iii) out of state travel for medical procedures
6 scheduled for one of the government's counsel in early January. As such, the parties are
7 stipulating to an extension of the Government's reply date from December 21, 2020 until
8 January 15, 2021. The additional time requested for the filing the responses is requested
9 mindful of the current trial date of March 8, 2021, the exercise of due diligence, in the
10 interests of justice, and not for any purpose of delay.

11
12 DATED: December 21, 2020.

13 NICHOLAS A. TRUTANICH
14 United States Attorney

15 /s/ *Penelope J. Brady*
16 PENELOPE J. BRADY
17 Assistant United States Attorney

RENE L. VALLADARES
Federal Public Defender

/s/ *Christopher Frey*
CHRISTOPHER FREY
Assistant Federal Public Defender
Counsel for Defendant

18 IT IS SO ORDERED.

19
20 DATED: December 21, 2020.

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HON. MIRANDA M. DU
UNITED STATES DISTRICT JUDGE